

**U.S. Department of Justice**
Civil Division

June 6, 2025

By ECF

Honorable Michael A. Hammer
United States Magistrate Judge
Martin Luther King, Jr. Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: ***Khalil v. Joyce, et al.*, Civ. Act. No. 25-1963 (MEF) (MAH)**
Government's Response to ECF No. 283

Dear Judge Hammer:

Respondents ("the Government") respectfully submit this response to the Court's order related to Petitioner Mahmoud Khalil's motion for a protective order, *see* ECF No. 283. The Government does not principally object to the Attorneys' Eyes Only designation.¹ Khalil's counsel kindly provided a draft of the protective order prior to their filing. After reviewing the Rasmussen assessment, the Government has sent back a redlined version with proposed edits. The Government will continue to work with Khalil's counsel in an effort to finalize a joint stipulation and confidentiality order by June 9, 2025.

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¹ The Court ordered the Government to file objections to Khalil's proposal to file the Rasmussen assessment under an Attorneys' Eyes Only designation. *See* ECF No. 283. In responding to the Court's order and agreeing to the designation, the Government does not agree with the reasoning as to why such a designation is necessary. *See* ECF No. 279 at 1.

Respectfully submitted,

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